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and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION TO AMEND  
CASE MANAGEMENT SCHEDULE**

Before the Court is Plaintiffs' Motion to Amend Case Management Schedule. Upon consideration of Plaintiffs' Motion and supporting papers submitted to the Court in connection therewith, and for good cause shown, the Court modifies the initial case management schedule, Dkt. 87, as follows:

**[Plaintiffs propose this first of two proposed amended schedules if the scope of summary judgment and further discovery is limited to fair use. See Plaintiffs' Mot. to Amend Case Mgmt. Schedule at 1-2.]**

Case Event	Current Deadline	Proposed Deadline
<b>Fact Discovery</b>		
Exchange Supplemental Initial Disclosures	N/A	October 7, 2024
Meet/Confer re: Existing Written Discovery/Priv. Logs	N/A	October 9, 2024
Letter Briefs re: Existing Written Discovery/Priv. Logs	N/A	October 11, 2024
Motion for Leave to Amend Complaint	N/A	October 11, 2024
Additional Written Discovery Requests	N/A	October 11, 2024
Identification of Addt'l Document Custodians/Deponents	N/A	October 11, 2024
Letter Briefs re: Addt'l Custodians/Deponents	N/A	October 18, 2024
Responses To Addt'l Discovery (served by 10/11)	N/A	November 4, 2024
Documents/Priv. Logs for Addt'l Discovery (served by 10/11)	N/A	November 7, 2024
Meet/Confer re: Responses to Addt'l Discovery (served by 10/11)	N/A	November 13, 2024
Letter Briefs re: Addt'l Discovery (served by 10/11)	N/A	November 15, 2024
Close of Fact Discovery	September 30, 2024	December 13, 2024

<b>Expert Reports</b>		
Opening Expert Reports Due	October 11, 2024	December 20, 2024
Rebuttal Expert Reports Due	November 8, 2024	January 15, 2025
Close of Expert Discovery	December 20, 2024	January 31, 2025
<b>Summary Judgment and Daubert Motions</b>		
Opening MSJ/ <i>Daubert</i> Briefs Due	January 1, 2025	February 7, 2025
Opposition to MSJ/ <i>Daubert</i> Briefs Due	February 7, 2025	March 7, 2025
Reply MSJ/ <i>Daubert</i> Briefs Due	February 21, 2025	March 21, 2025
Motion for Summary Judgment Hearing	March 6, 2025	March 27, 2025

[Plaintiffs propose this second of two schedules if the scope of summary judgment and further discovery is *not* limited to fair use. See Plaintiffs' Motion to Amend Case Mgmt. Schedule at 2-3.]

Case Event	Current Deadline	Proposed Deadline
<b>Fact Discovery</b>		
Close of Fact Discovery	September 30, 2024	January 24, 2025
<b>Expert Reports</b>		
Opening Expert Reports Due	October 11, 2024	February 14, 2025
Rebuttal Expert Reports Due	November 8, 2024	March 7, 2025
Close of Expert Discovery	December 20, 2024	March 28, 2025
<b>Summary Judgment and Daubert Motions</b>		
Opening MSJ/ <i>Daubert</i> Briefs Due	January 1, 2025	April 25, 2025
Opposition to MSJ/ <i>Daubert</i> Briefs Due	February 7, 2025	May 23, 2025

Reply MSJ/ <i>Daubert</i> Briefs Due	February 21, 2025	June 13, 2025
Motion for Summary Judgment Hearing	March 6, 2025	June 26, 2025

**IT IS SO ORDERED**, on this date \_\_\_\_\_.

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The Honorable Vince Chhabria  
UNITED STATES DISTRICT JUDGE